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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MEELAD DEZFOOLI,

Defendant.

Case No.: 2:22-CR-142-RFB-DJA

**STIPULATION TO EXTEND
DISCOVERY DEADLINES**

It is hereby stipulated and agreed, by and between Jason M. Frierson, United States Attorney, and Eric C. Schmale, Assistant United States Attorney, and D. Zachary Adams, Trial Attorney, Money Laundering and Asset Recovery Section; and David Chesnoff and Richard Schonfeld, Esq., attorneys for Defendant Meelad Dezfooli, that the Court to extend

1 the deadlines for meeting and conferring regarding discovery, and the deadline for the
2 government disclosure statement.

3 This Stipulation is entered into based on the following circumstances and reasons:

- 4 1. The initial appearance and arraignment for defendant Meelad Dezfooli was held
5 on July 11, 2022. Local Rule 16-1(b)(2) provides that within seven days of
6 arraignment, the parties must meet and confer regarding discovery. The local rule
7 further provides that within seven days of this conference, the government must
8 file its disclosure statement.
- 9 2. At the July 11, 2022, proceeding, David Chesnoff, Esq. and Richard A Schonfeld,
10 Esq., entered a special appearance on behalf of the defendant for purposes of the
11 initial appearance and detention hearing. ECF No. 14. The Honorable Magistrate
12 Judge Brenda Weksler ordered Defendant to provide a status update regarding his
13 legal representation no later than July 18, 2022. ECF No. 6.
- 14 3. On July 18, 2022, counsel for the defendant David Chesnoff, Esq., filed a motion
15 to withdraw from the case and recommended that the case be referred to the
16 Federal Public Defender. ECF No. 19. That motion remains pending.
- 17 4. Also on July 18, 2022, the government called Mr. Chesnoff to confer regarding
18 discovery. In this call, the parties agreed that it would be appropriate for the
19 discovery conference to proceed after the Court has ruled on defense counsel's
20 motion to withdraw and any new counsel of record has appeared on behalf of the
21 defendant.
- 22 5. Accordingly, the parties request that the deadlines for a discovery conference and
23 the government filing of a government disclosure statement be continued 21 days
24 from the present deadlines under the Local Rules, and that the parties shall have

1 until August 8, 2022, to confer regarding discovery, and the government shall
2 have until August 15, 2022, to file its disclosure statement.

3
4 DATED this 20th day of July, 2022.

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6 JASON M. FRIERSON
United States Attorney

CHESNOFF & SCHONFELD, PC

7 /s/ Eric C. Schmale
8 ERIC C. SCHMALE
Assistant United States Attorney
9 D. ZACHARY ADAMS
Trial Attorney

/s/ David Z. Chesnoff
10 DAVID Z. CHESNOFF
11 RICHARD A. SCHONFELD
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UNITED STATES DISTRICT COURT
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Case No.: 2:22-CR-142-RFB-DJA

[PROPOSED] ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court ORDERS that counsel for the parties shall hold a discovery conference no later than August 8, 2022, and that the government shall file its disclosure statement no later than August 15, 2022.

Dated this 22nd day of July 2022,

By: 
RICHARD F. BOULWARE II
UNITED STATES DISTRICT JUDGE